

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**MARK ANTHONY ORTEGA,**

**Plaintiff,**

**v.**

**LOUIS AMBROSIO AND  
BLOCK EQUITY GROUP, LLC,**

**Defendants.**

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**CASE NO. 5:24-CV-00838-FB-ESC**

**AGREED MOTION TO WITHDRAW  
PLAINTIFF’S MOTION FOR CLERK’S ENTRY OF DEFAULT**

Defendant Block Equity Group, LLC (“Block”) and Louis Ambrosio (“Ambrosio”) file this Agreed Motion to Withdraw Plaintiff’s Motion for Clerk’s Entry of Default, as follows:

1. On September 14, 2024, Plaintiff mailed his Motion for Clerk’s Entry of Default as to Louis Ambrosio.

2. On September 15, 2024, counsel for Defendant Ambrosio and Plaintiff agreed via email to the relief sought in Defendant Block Equity Group, LLC’s Unopposed Motion to Set Aside Entry of Default and Defendants’ Motion for Extension of Time to File Response (the “Motion for Extension of Time”). (Dkt. 9).

3. On September 17, 2024, the Court Granted the Motion for Extension of Time, establishing October 4, 2024 as the deadline for Defendants to respond to Plaintiff’s Complaint.

4. Also on September 17, 2024, the undersigned received notice of the Motion for Entry of Default as to Louis Ambrosio, filed by the Clerk on September 16, 2024.

5. Accordingly, pursuant to the agreement in the Motion for Extension of Time, the Parties respectfully request that Plaintiff’s Motion for Clerk’s Entry of Default as to Louis

Ambrosio be withdrawn, or otherwise denied as moot.

Dated: September 18, 2024.

Respectfully submitted,

**MUNSCH HARDT KOPF & HARR, P.C.**

By: /s/ Michael A. Harvey

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**AGREED:**

/s/ Mark Anthony Ortega (w/ permission)

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**CERTIFICATE OF CONFERENCE**

I hereby certify that on September 17, 2024, I communicated via email with Plaintiff regarding the relief sought by this motion. Plaintiff agreed to the relief sought in this Motion.

/s/ Earl L. Ingle

Earl L. Ingle

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on counsel or parties of record by means of e-filing and/or electronic mail this 18<sup>th</sup> day of September, 2024. On September 15, 2024, Plaintiff agreed to accept service of filings in this matter via email.

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/s/ Michael A. Harvey

Michael A. Harvey